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98-143

SEP 29 1998

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1908 Floyd Rd.  
Springdale, Ark. 72762

September 16, 1998

Chairman, Federal Communications Commission  
Washington, D. C.

PR  
SEP 29

REC'D

Dear Mr. Chairman:

I am writing to express my ~~views~~ <sup>opinions</sup> on proposals to change the rules for the Amateur Radio Service. I am not a member of American Radio Relay League.

I support the proposal to eliminate the Novice class and give current Novices credit for the telegraphy requirement for other classes up to General Class. The Novice class no longer serves a purpose. In the interest of simplifying rules and reducing paperwork and enforcement requirements, I support the proposal to allow the remaining Novices to operate code on any frequencies open to General Class.

I support the proposal to eliminate the Technician Plus class. Persons who acquired Technician licenses before March 21, 1987, should be admitted to the General class, since they have already passed the General written test ~~and~~ for voice and because they should receive the same privileges as <sup>proposed for</sup> Novices in any frequencies open to General Class. The remaining Technician Plus persons should be given the same telegraphy privileges as proposed for Novices.

The above proposals would give you four classes plus a few Novices and Technician

Plus licensees that would phase out fairly quickly by permitting them to advance to General Class by passing only the written test for General.

I support the proposal to permit General class persons to administer examinations for Technician class. I also support the ARRL proposals to permit Advanced Class persons to administer General and Technician class examinations.

I support the proposal to eliminate the RACES license since operators can still participate in emergency communications by registering with a Civil Defense or Emergency organization.

I disagree with the ARRL proposal to establish a private sector complaint procedure. I think enforcement <sup>and competent</sup> should be a function of professionally <sup>competent</sup> government specialists properly supervised, and ~~professionally~~ <sup>competent</sup>.

I propose reducing the General Class code requirement to 5 words per minute <sup>in part</sup> to accommodate the persons in classes you propose to eliminate. Furthermore, I have never understood why persons who are interested primarily in HF voice must pass high-speed code requirements. Occasionally HF users may need to use code for clarity of transmission or to overcome language or accent problems, but such occasional use will probably require slower transmission anyway. I would propose 13 words per minute for Advance and Extra Classes. In this I disagree with the ARRL proposals.

I disagree with the ARRL proposal to require a handicapped person to attempt to

pass a telegraphy proficiency examination before requesting a doctor's certification. This proposal reflects ignorance of physical and mental stresses and fails to provide accommodation for handicaps as required by law.

I also disagree with the ARRL proposal to permit volunteer examiners to review medical records pertaining to a person's disability. The volunteer examiners lack professional qualifications to make such determinations. Moreover, to allow non-professional people to review medical papers would clearly constitute an invasion of privacy. Anything in this area should be handled only by professionally qualified, government employee and the person's physician.

My only comment on proposals to allow volunteer examiners additional flexibility in determining contents of examinations is that these persons may lack qualifications to determine the knowledges and abilities required. As you know, <sup>setting</sup> examination standards requires a great deal of research and validation.

I also propose that examinees should be given the option to answer from multiple choice questions or fill-in-the-blank as a means of demonstrating code proficiency. He or she may not be able to take exact copy but can still get the principal copy.

One more comment; It has been demonstrated in the courts and in personnel

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management literature that there is a difference between proficiency in an examination and proficiency on the job. This is part of the basis for my support of proposals to reduce considerably the code - proficiency requirements in the examination. Some people can send and receive copy at 15 words a minute but cannot pass a test at 13 words a minute with three examiners standing over them.

Thank you for the opportunity to express my views directly to the Federal Communications Commission.

Sincerely,

Thomas L. Floyd  
THOMAS L. FLOYD

July 14, 1974